

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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ROBERT BAGLEY,

Plaintiff,

Case No. 10 Civ. 1592 (PGG)(RLE)

-against-

JPMORGAN CHASE & CO.,

AFFIRMATION OF MILTON L.
WILLIAMS IN OPPOSITION TO
DEFENDANT'S MOTIONS IN LIMINE

Defendant.

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MILTON L. WILLIAMS, under penalty of perjury, affirms and states as follows:

1. I am a partner at Vladeck, Waldman, Elias & Engelhard, P.C., counsel for plaintiff, Robert Bagley ("plaintiff" or "Bagley"), and I submit this affirmation in opposition to defendant's Motions In Limine.
2. On August 7, 2009, I spoke by phone to counsel for defendant JPMorgan Chase & Co ("Chase"). We discussed Bagley's legal claims against Chase.
3. Attached as Exhibit A is a true and correct copy of the Affirmation of Milton L. Williams in Opposition to Summary Judgment, dated July 13, 2011.
4. Attached as Exhibit B is a true and correct copy of proposed trial exhibit 18, a list of Chase employees. (Bates No. JPMC 3055-56)
5. Attached as Exhibit C is a true and correct copy of proposed trial exhibit 19, a highlighted list of Chase employees. (Bates No. JPMC 3055-56)
6. Attached as Exhibit D is a true and correct copy of defendant's production index.
7. Attached as Exhibit E is a true and correct copy of an excerpt from Plaintiff's First Request for the Production of Documents, dated June 4, 2010.

8. Attached as Exhibit F is a true and correct copy of an excerpt from Plaintiff's First Set of Interrogatories, dated June 4, 2010.

9. Attached as Exhibit G is a true and correct copy of proposed trial exhibit 21, a chart entitled "Employees Reporting to Robert Bagley at the Time of the 2009 Mid Year Reviews."

10. Attached as Exhibit H is a true and correct copy of proposed trial exhibit 22, a chart entitled "Employees Working Under Eric Carr Who Left Chase During Carr's Tenure in WSS."

I declare under penalty of perjury that the foregoing is true and correct. Executed on October 10, 2012 in New York, New York.


MILTON L. WILLIAMS